Remarks

[0001]   Herein, the "Action" or "Office Action" refers to the Office Action dated July 16, 2007.

[0002]   Applicant respectfully requests reconsideration and allowance of all pending claims of the application. Claims 1, 4, 5, 7-12, 14, 15, and 17-32 are presently pending. Claims amended herein are 1, 12, 15, 22, and 28-32. No claims are canceled herein. No new claims are added herein.

[0003]   Applicant's amendments and remarks after Final are appropriate under 37 C.F.R. §1.116 because they address the Office's remarks in the Final Action, and thus could not have been presented earlier. In addition, the amendments and remarks should be entered to place the case in better form for appeal.

Substantive Claim Rejections

35 USC § 102 Claim Rejections

[0004]   Claims 1, 4, 11-12, 22-23, 28, and 30-31 are rejected under 35 U.S.C. §102(e) as being anticipated by International Publication No. WO 01/757736 to Arora et al. (hereinafter, "Arora International") (*Office Action,* p.2).

[0005]   Applicant respectfully traverses the rejections, and requests reconsideration and allowance in light of the comments and amendments

contained herein. Accordingly, Applicant requests that the rejections be withdrawn and that the case be passed along to issuance.

[0006] <u>Claim 1</u> as amended, now recites in part:

selecting a first set of one or more of the values from the extensible list of values to be a first set of target criteria to designate a subset of the information resources relevant to the user based at least in part on priority weights selected by the user, wherein the priority weights of each attribute associated with a value in the first set of target criteria are added to obtain a priority sum for the first set of target criteria;

selecting additional sets of target criteria to designate a spectrum of subsets of the information resources relevant to the user, wherein the additional sets of target criteria include priority weights selected by the user, and wherein the priority weights of each attribute associated with a value for each of the additional sets of target criteria are added respectively to obtain different priority sums for each of the additional sets of target criteria;

comparing the different priority sums of each additional set of target criteria to the priority sum of the first set of target criteria to determine whether each of the additional sets of target criteria designates a more general or a more specific subset of information resources relevant to the user than designated by the first set of target criteria;

[0007] In order for Arora International to anticipate this claim, Applicant submits that Arora International must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that Arora

International does not disclose all of the claimed elements and features of claim 1.

[0008] For example, Arora International does not show or disclose "selecting a first set of one or more of the values from the extensible list of values to be a first set of target criteria to designate a subset of the information resources relevant to the user based at least in part on priority weights selected by the user, wherein the priority weights of each attribute associated with a value in the first set of target criteria are added to obtain a priority sum for the first set of target criteria" and "selecting additional sets of target criteria to designate a spectrum of subsets of the information resources relevant to the user, wherein the additional sets of target criteria include priority weights selected by the user, and wherein the priority weights of each attribute associated with a value for each of the additional sets of target criteria are added respectively to obtain different priority sums for each of the additional sets of target criteria" and then "comparing the different priority sums of each additional set of target criteria to the priority sum of the first set of target criteria to determine whether each of the additional sets of target criteria designates a more general or a more specific subset of information resources relevant to the user than designated by the first set of target criteria", as recited in claim 1 (Emphasis Added).

[0009] To support its assertion of anticipation, the Office argues that "Arora's total score is equivalent to the claimed priority sum" and that "Arora's quality match is equivalent to the claimed comparing of priority

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sums" (*Office Action*, p.4; *Arora International*, p.6 lns.20-33, and p.11 ln.32 to p.12 ln.7). Applicant respectfully disagrees with the suggested equivalency for at least the reasons described below.

[0010] Applicant first notes that the "comparing the different priority sums" recited in claim 1, deals with comparing a priority sums of a first set of target criteria to the priority sums of additional sets of target criteria, where each of the priority sums being compared are based on priority weights assigned by the user (*Specification*, p.20 lns.13-24, p.22 ln.22 to p.24 ln.25, and Fig.12). The comparison determines whether each of the additional sets of target criteria designates a more general or a more specific subset of information resources relevant to the user than the information resources which are designated by the first set of target criteria. Applicant notes that the comparison is not concerned with matching the preferences of two different users or with matching two different sides of a transaction, but is instead concerned with comparing different sets of target criteria which each have priority weights assigned by the same user.

[0011] In contrast, the "match" described in Arora International which the Office argues is equivalent to the claimed "comparing the different priority sums" is clearly a matching of preferences between two different sides of a transaction, for example, a buyer's preferences and a seller's preferences are each considered to determine the quality of the match between the buyer and the seller (*Arora International*, Abstract).

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[0012]   To support its assertion of anticipation with regard to this element (*i.e.,* comparing the different priority sums), the Office cites to page 11 line 32 to page 12 line 7 of Arora International (*Office Action,* p.4; *Arora International,* p.11 ln.32 to p.12 ln.7).   The cited section is reproduced below:

> The quality of the match between buyer 1 and seller 1 depends on both the quality of the match and on any given attribute and its importance. In particular, it satisfies the property that there can still be a good match when the buyer and seller disagree on a characteristic, but that characteristic is deemed irrelevant (or almost irrelevant) to the parties.

[0013]   As the cited section of Arora International demonstrates, the "match" described does not compare different sets of target criteria which were each assigned priority weights by a single user to determine which of the different sets of target criteria designates information more relevant to the user. Instead, the cited section describes a match between buyer 1 and seller 1, and further describes that "there can still be a good match when the buyer and seller disagree on a characteristic, but the characteristic is deemed irrelevant (or almost irrelevant) to the parties." Thus the cited section emphasizes that the comparison described in Arora International is between two different parties' preferences (*i.e.,* a buyer's preferences and a seller's preferences).

[0014]   Applicant notes that Arora International, page 12 lines 8-26 provides a further description of how the "quality of the match" is calculated, and Arora International states:

> To achieve a total match score for any given party to a match, two records are chosen, *e.g.,* the record of the worker who is shopping for a job and one of the many potential employers who are shopping for workers. Then the matching engine calculates ... a score.

> After each party's view of the match is calculated, an overall match score for a pair of agents is computed as a function of each party's score...

[0015]   Once again, the cited section clearly demonstrates that the comparison is between two different parties preferences (*i.e.,* a buyer's preferences and a seller's preferences). Arora describes that two different match values (*i.e.,* the buyer's view of the match and the seller's view of the match) are calculated, and these two different match scores are then combined to determine an overall match score.   In short, Arora International's "quality match" is not equivalent to the claimed "comparing of priority sums" as asserted by the Office (*Office Action*, p.4).

[0016]   Applicant therefore submits that Arora International does not show or disclose "selecting a first set of one or more of the values from the extensible list of values to be a first set of target criteria to designate a subset of the information resources relevant to the user based at least in part on priority weights selected by the user..." and then "selecting additional sets of target criteria to designate a spectrum of subsets of the

information resources relevant to the user, wherein the additional sets of target criteria include priority weights selected by the user, and wherein the priority weights of each attribute associated with a value for each of the additional sets of target criteria are added respectively to obtain different priority sums for each of the additional sets of target criteria" and then "comparing the different priority sums of each additional set of target criteria to the priority sum of the first set of target criteria to determine whether each of the additional sets of target criteria designates a more general or a more specific subset of information resources relevant to the user than designated by the first set of target criteria", as recited in claim 1.

[0017]   Accordingly, for at least these reasons, claim 1 is allowable over Arora, and Applicant respectfully requests that the 102 rejection be withdrawn.

[0018]   **Claims 4 and 11** are allowable by virtue of their dependency upon claim 1. Additionally, claims 4 and 11 may be allowable over Arora International for independent reasons.

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[0019] <u>**Claim 12**</u> as amended, recites one or more computer-readable media encoded with a data structure for use in comparing a priority sum of a first set of target criteria with different priority sums of additional sets of target criteria to determine whether each of the different sets of target criteria designates a more general or a more specific subset of content resources relevant to the user than designated by the first set of target criteria, the data structure comprising:

> an extensible table of attributes, wherein various content elements in an information system possess values of the attributes and wherein each attribute in the extensible table of attributes is associated with a priority weight assigned by a user and which is used for weighting purposes during a localization of content elements relevant to the user;
>
> an extensible table of values of the attributes, wherein each value is associated with its corresponding attribute, and wherein each attribute is associated with a priority weight selected by the user; and
>
> multiple sets of one or more values, taken from the extensible table of values to designate multiple subsets of content elements relevant to the user, wherein one of the multiple sets represents a first set of target criteria, and wherein others of the multiple sets represent different sets of target criteria, and wherein a priority weight of each attribute associated with each value in each set is summed to determine a priority sum of the respective set and the priority sums of respective sets in the multiple sets can be compared to determine whether each of the different sets of target criteria designates a more general or a more specific subset of content resources relevant to the user than designated by the first set of target criteria.

[0020] In order for Arora International to anticipate this claim, Applicant submits that Arora International must disclose each and every

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element and feature of the claim and that they must be arranged in the same manner as the claim. Claim 12 is rejected under similar rational as set forth in the rejection of claim 1, and Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Arora International does not disclose all of the claimed elements and features of claim 12.

[0021]   Claim 12 recites "an extensible table of values of the attributes, wherein each value is associated with its corresponding attribute, and <u>wherein each attribute is associated with a priority weight selected by the user</u>" (Emphasis Added). Claim 12 further recites "multiple sets of one or more values, taken from the extensible table of values to designate multiple subsets of content elements, wherein one of the multiple sets represents a first set of target criteria, and wherein others of the multiple sets represent different sets of target criteria, and relevant to the user wherein a priority weight of each attribute associated with each value in each set is summed to determine a priority sum of the respective set and the priority sums of respective sets in the multiple sets can be compared..."

[0022]   Similar to the arguments presented in response to the rejection of claim 1, the comparison recited in claim 12 deals with comparing a priority sums of a first set of target criteria to the priority sums of different sets of target criteria, where each set of target criteria is taken from the extensible table of values, and where the values are associated with a priority weight assigned by the user (*Specification*, p.20

lns.13-24, p.22 ln.22 to p.24 ln.25, and Fig.12). Applicant notes that the comparison is concerned with comparing different sets of target criteria which each have priority weights assigned by the same user, and is not concerned with matching the preferences of two different users or with matching two different sides of a transaction. For the sake of brevity, Applicant has not repeated all of the arguments.

[0023] Accordingly, claim 12 is allowable over Arora International for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0024]   **Claim 22** as amended, recites one or more computer readable media containing instructions that are executable by a computer to perform actions, comprising:

> associating priority weight values assigned by a user with attributes in a dynamic list of attributes associated with a plurality of information resources in an information system;
> associating instances of attribute values with corresponding attributes in a dynamic list of attribute values;
> designating subsets of the plurality of information resources based on sets of one or more of the attribute values, wherein each of the attribute values is associated with a priority weight value assigned by the user;
> comparing the sets of one or more attribute values according to respective priority sums to determine which of the one or more of the subsets of the plurality of information resources are more relevant to the user, wherein a priority sum is obtained by summing priority weight values assigned by the user associated with each attribute corresponding to an attribute value in a set of one or more of the attribute values.

[0025]   In order for Arora International to anticipate this claim, Applicant submits that Arora International must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Claim 22 is rejected under similar rational as set forth in the rejection of claim 1, and Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Arora International does not disclose all of the claimed elements and features of claim 22. For example, Arora International does not show or disclose "comparing the sets of one or more attribute values according to respective priority sums to determine which of the one or

more of the subsets of the plurality of information resources are more relevant to the user, wherein a priority sum is obtained by summing priority weight values assigned by the user associated with each attribute corresponding to an attribute value in a set of one or more of the attribute values."

[0026]   Similar to the arguments presented in response to the rejection of claim 1, the comparison recited in claim 22 deals with comparing the sets of attribute values according to respective priority sums (to determine which of the subsets of information resources are more relevant to the user), and that the priority sums are each obtained by summing priority weight values assigned by the user (*Specification*, p.20 lns.13-24, p.22 ln.22 to p.24 ln.25, and Fig.12). As such, the claim comparing is of different sets of target criteria which each have priority weights assigned by the same user.   In contrast Arora International describes matching the preferences of two different users or with matching two different sides of a transaction. For the sake of brevity, Applicant has not repeated all of the arguments.

[0027]   Accordingly, claim 22 is allowable over Arora International for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0028]   **Claim 23** is allowable by virtue of its dependency upon claim 22. Additionally, claims 23 may be allowable over Arora International for independent reasons.

[0029] **Claim 28** as amended, recites a computing system, comprising:

> an information system including:
>> a plurality of information resources, each having one or more attributes;
>> an extensible table of the attributes, wherein each attribute is assigned a priority weight by a user;
>> an extensible table of values for the attributes, wherein each value is associated with its corresponding attribute; and
>> sets of the values, wherein each set specifies a subset of the information resources relevant to the user, and wherein each set can be differentiated as being a more general or a more specific subset of information relevant to the user by the sum of ~~the~~ priority weights assigned by the user to each attribute represented by a value in each set; and
> a content management engine, including:
>> a classification engine to determine the attributes of the plurality of information resources in the information system;
>> an attribute table manager in communication with the extensible table of attributes, wherein the extensible table of attributes includes the attributes of the plurality of information resources;
>> a prioritizer which accepts user input to assign the priority weights to each attribute in the extensible table of attributes;
>> a values table manager in communication with the extensible table of values, wherein each value and its associated attribute possessed by one of the information resources is represented in the extensible table of values;
>> a target criteria engine to create target criteria sets of one or more of the values, wherein a target criteria set designates a subset of the information resources in the information system based on the one or more values; and

a localization engine to make information resources in the subset available to a user of the information system, having a target criteria set comparator to compare a priority sum of priority weights assigned by the user for a first target criteria set to a priority sum of priority weights assigned by the user for a second target criteria set to determine which of first and second target criteria sets locate information resources which are more relevant to the user, wherein a priority sum is the sum of the priority weights of the values in a given target criteria set.

[0030] In order for Arora International to anticipate this claim, Applicant submits that Arora International must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Claim 28 is rejected under similar rational as set forth in the rejection of claim 1, and Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Arora International does not disclose all of the claimed elements and features of claim 28. For the sake of brevity, Applicant has not repeated all of the arguments.

[0031] In addition, Aroroa does not disclose the additional features of the content management engine which are recited in claim 28.

[0032] Accordingly, claim 28 is allowable over Arora International for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0033]   **Claims 30 and 31** are allowable by virtue of their dependency upon claim 28.   Additionally, claims 30 and 31 may be allowable over Arora International for independent reasons.

35 USC § 103 Claim Rejections

[0034]   Claims 5, 14, 15, 17-21, 24, 25, and 32 are rejected under 35 U.S.C. §103(a) for obviousness over Arora International in view of U.S. Patent Application Publication No. 2003/0130887 to Nathaniel (hereinafter, "Nathaniel") (*Office Action,* p.9).

[0035]   Claims 7-10, 26, 27, and 29 are rejected under 35 U.S.C. §103(a) for obviousness over Arora International in view of U.S. Patent Application Publication No. 2002/0032638 to Arora et al. (hereinafter, "Arora US") (*Office Action,* p.21).

[0036]   Applicant respectfully traverses each of these 35 U.S.C. §103 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein.

[0037] **Claim 15** recites a content management engine, comprising:

a classification engine to determine attributes of a plurality of information resources in an information system;

an attribute table manager in communication with a dynamic table of attributes and priorities, wherein the dynamic table of attributes and priorities includes the attributes of the plurality of information resources;

a prioritizer which accepts user input to assign priority weights to each attribute in the table of attributes and priorities;

a values table manager in communication with a dynamic table of values, wherein each value and its associated attribute possessed by one of the information resources is represented in the table of values;

a target criteria engine to create target criteria sets of one or more of the values, wherein a target criteria set designates a subset of the information resources in the information system based on the one or more values; and

a localization engine to make information resources in the subset available to a user of the information system, having a target criteria set comparator to compare a priority sum of priority weights assigned by a user for a first target criteria set to a priority sum of priority weights assigned by the user for a second target criteria set to determine which of first and second target criteria sets locate information resources which are more relevant to the user, wherein a priority sum is the sum of the priority weights of the values in a given target criteria set.

[0038] Arora International and/or Nathaniel do not teach or suggest the combination of features recited in claim 15. The Office acknowledges that Arora International does not explicitly describe a localization engine as recited in claim 15, and relies on Nathaniel as disclosing this element of the claim (*Office Action*, p. 15).

[0039]   However, Nathaniel fails to cure the deficiencies of Arora International, as Nathaniel does not teach or suggest "a localization engine to make information resources in the subset available to a user of the information system, having a target criteria set comparator to compare a priority sum of priority weights <u>assigned by a user</u> for a first target criteria set to a priority sum of priority weights <u>assigned by the user</u> for a second target criteria set to determine which of first and second target criteria sets locate information resources which are more relevant to the user, wherein a priority sum is the sum of the priority weights of the values in a given target criteria set", as recited in claim 15 (Emphasis Added).

[0040]   Instead, Nathaniel describes a method for scheduling delivery of content (*e.g.,* advertisements to consumers) via a plurality of network devices (*e.g.,* set top boxes, computers with internet, etc). The scheduling is such that a Delivery Manager 54 generates the best plan for the current day's scheduled deliveries (*Nathaniel,* p.3 [0026]). The Delivery Manager 54 Numerous includes severs factors such as minimizing cost of delivery when generating the plan (*Nathaniel,* p.4 [0032]).

[0041]   Therefore, Nathaniel does not teach or suggest a localization engine to "compare a priority sum of priority weights assigned by a user for a first target criteria set to a priority sum of priority weights assigned by the user for a second target criteria set to determine which of first and second target criteria sets locate information resources which are more relevant to the user, wherein a priority sum is the sum of the priority weights of the values in a given target criteria set", as recited in claim 15.

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[0042] **Claims 17-21** are allowable over the Arora International-Nathaniel combination by virtue of their dependency upon claim 15. Claims 17-21 may also be allowable over the Arora International-Nathaniel combination for independent reasons.

[0043] **Claims 5, 14, 24, 25, and 32** are rejected under 35 U.S.C. §103(a) as being obvious over Arora International in view of Nathaniel. The Applicant notes that none of the claims 5, 14, 24, 25, and 32 are independent claims, and that each of these claims ultimately depend from one of the independent claims (here claims 1, 22, and 28 respectively). Applicant further notes that it is axiomatic that any dependent claims which depend from an allowable base claim are also allowable, and therefore the Applicant does not believe that it is necessary to present arguments in favor of claims 5, 14, 24, 25, and 32, as these claims should be allowable for at least the reasons discussed above in response to rejection of the independent claims, as well as for their own recited features which are neither shown nor supported by the cited references. Further, Applicant notes that Nathaniel fails to cure the deficiencies described above with respect to Arora International, and the §102 rejections of claims 1, 22, and 28.

[0044] Accordingly, Applicant requests that the §103 rejection be withdrawn and that claims 5, 14, 24, 25, and 32 be allowed in the next

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[0045] <u>Claims 7-10, 26, 27, and 30</u> are rejected under 35 U.S.C. §103(a) as being obvious over Arora International in view of Arora US. The Applicant notes that none of the claims 7-10, 26, 27, and 30 are independent claims, and that each of these claims ultimately depend from one of the independent claims (here claims 1, 22, and 28 respectively). Applicant further notes that it is axiomatic that any dependent claims which depend from an allowable base claim are also allowable, and therefore the Applicant does not believe that it is necessary to present arguments in favor of claims 7-10, 26, 27, and 30, as these claims should be allowable for at least the reasons discussed above in response to rejection of the independent claims, as well as for their own recited features which are neither shown nor supported by the cited references. Further, Applicant notes that Arora US fails to cure the deficiencies described above with respect to Arora International, and the §102 rejections of claims 1, 22, and 28.

[0046] Accordingly, Applicant requests that the §103 rejection be withdrawn and that claims 7-10, 26, 27, and 30 be allowed in the next Action.

Dependent Claims

[0047] In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

[0048] All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: *10-30-2007*

By: _____

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